



SONG P.C.  
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NEW YORK, NY 10004

June 19, 2025

**Via ECF**

Hon. Katherine Polk Failla  
United States District Judge  
United States District Court  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: Toaquiza v. Joyce, No. 25 Civ. 4791 (KPF)**

Dear Judge Failla:

I, along with Tracey Kitzman, are pro bono counsel of record for Petitioner Derlis Snaider Chusin Toaquiza in the above-referenced matter. Pursuant to the Court's Order dated June 18, 2025, Ms. Kitzman and I have been directed to appear at a video conference scheduled for June 20, 2025 at 3:30pm.

I respectfully request to be excused from appearing at the conference, as I have a longstanding family commitment that conflicts with the scheduled time—specifically, the celebration of a family member's 80th birthday.

Ms. Kitzman and our co-counsel Nuala Naranjo-O'Doherty of the Jackson Heights Immigrant Center will be appearing at the video conference and are fully prepared to address any matters that may arise during the conference.

Thank you very much for your consideration of this request. Please let me know if the Court would like any additional information.

Sincerely,

/s/ Peter B. Katzman  
Peter B. Katzman

cc: Anthony J. Sun (by ECF)

Application GRANTED.

Dated: June 20, 2025  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE